

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: : **Chapter 13 Proceedings**
Kevin Ray Hughes : **Case No.: 19-60557**
Miranda Janiel Hughes : **Judge Russ Kendig**
Debtors

OBJECTION TO MOTION TO INCUR DEBT

Now comes Dynele L. Schinker-Kuharich, Chapter 13 Trustee, and objects to motion of Debtor(s) to incur debt. Trustee believes that undertaking the proposed debt may not be in the best interest of Debtor(s), and could jeopardize the opportunity of Debtor(s) for a fresh start.

Trustee's objection is based upon the uncertainty as to the extent that Debtor(s) have explored the availability of other more advantageous automobile purchase/lease options. Trustee is unable to determine if income is sufficient for Debtors to afford the new vehicle payment. Trustee requests the following:

1. Amended Schedules I and J be filed.
2. An explanation of how the down payment of \$1,500.00 was obtained.

Now therefore, Trustee respectfully requests that the Court deny the Motion to Incur Debt.

Respectfully submitted,

/s/ Dynele L. Schinker-Kuharich
Dynele L. Schinker-Kuharich (0069389)
Chapter 13 Trustee
A. Michelle Jackson Limas (0074750)
Staff Counsel to the Chapter 13 Trustee
200 Market Avenue North, Ste. 30
Canton, OH 44702

Telephone: 330.455.2222
Facsimile: 330.754.6133
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NOTICE OF HEARING

Kindly take Notice that Trustee's Objection to Motion to Incur Debt regarding the above captioned Debtor(s), will come on for hearing on **February 19, 2020 at 2:00 p.m.** Said hearing will take place in the U. S. Bankruptcy Court, Ralph Regula Federal Building, 401 McKinley Ave SW, Canton, Ohio 44702.

/s/ Dynele L. Schinker-Kuharich
Dynele L. Schinker-Kuharich (0069389)
Chapter 13 Trustee
A. Michelle Jackson Limas (0074750)
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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2020, a true and correct copy of the notice was served via the Court's Electronic Case Filing System upon these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Office of the United States Trustee at [RegisteredEmailAddress]@usdoj.gov
- Office of the Chapter 13 Trustee at dlsk@Chapter13Canton.com
- James F. Hausen, Counsel for Kevin Ray and Miranda Janiel Hughes, at batesfirmecf@gmail.com

and via regular U.S. Mail, postage prepaid, upon:

Kevin Ray Hughes , Debtor
131 Bradley Street
Rittman, OH 44270

Miranda Janiel Hughes, Debtor
131 Bradley Street
Rittman, OH 44270

/s/ Dynele L. Schinker-Kuharich
Dynele L. Schinker-Kuharich
Chapter 13 Trustee